COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Proceeding by the Department of Telecommunications and Energy on its own Motion to Implement the Requirements of the Federal Communications Commission's Triennial Review Order Regarding Switching for Mass Market Customers	D.T.E. 03-60

AT&T'S PROPOSED DISCOVERY REQUESTS FOR THE FIRST ROUND OF DISCOVERY TO BE ISSUED BY THE DEPARTMENT

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AT&T Communications of New England, Inc. ("AT&T") respectfully requests that the Department include the following discovery requests in the initial round of discovery to be issued by the Department. These requests are relevant to issues concerning any challenge by Verizon of the FCC's nationwide finding of impairment without access to unbundled switching, including to issues regarding geographic market definition, the trigger aspect of the mass market switching impairment analysis, operational and economic impairment issues of potential relevance to geographic market definitions, and the requirement to develop an adequate and viable batch hot cut process. AT&T reserves the right to promulgate further discovery.

I. PROPOSED DISCOVERY TO VERIZON.

A. Requests to Verizon Specific to the Trigger Aspect of the Mass Market Switching Impairment Analysis.

1. Wholesale Trigger Claims.

1. Please identify any telecommunications carrier or other company that Verizon-Massachusetts believes or claims is actively providing wholesale unbundled local switching used in combination with unbundled analog loops obtained from Verizon to CLECs.
   a. Identify each wire center in which a wholesale alternative to Verizon offers unbundled circuit switching, and for each such wire center identify each wholesale provider and provide the basis upon which Verizon believes such entity qualifies as a wholesale provider.
   b. Produce all documents substantiating any assertion that an unaffiliated competitive switch provider qualifies as a wholesale provider and the product, customer and geographic market that Verizon believes is served by such wholesale provider.
   c. Produce all documents substantiating any assertion that a wholesale switching provider other than Verizon is operationally ready to provide wholesale switching and that such provider and Verizon has procedures in place to enable a carrier purchasing Verizon analog loop to provide service of equivalent quality using switching obtained from some other wholesale switching provider.
   d. Provide any documents, information, notes, work papers, or communications from the identified company in Verizon's possession or control relating to the identified company's ability, intent, desire, or willingness (or lack of the foregoing) to provide or to make available wholesale unbundled local switching to CLECs.
2. For each carrier or other company listed in response to question 1, please provide for each switch that Verizon believes or claims provides a wholesale alternative:
   a. The 11-digit Common Language Location ("CLLI") code of the switch as it appears in the Local Exchange Routing Guide ("LERG"), the vertical and horizontal ("V&H") coordinates of the switch from the LERG, and claimed function of the switch (*e.g.*, stand-

alone, host, or remote).

b. The central office location of each collocation arrangement that Verizon claims is interconnected to the switch.

c. The number of Verizon loops, by type (i.e., analog UNE, DS-1 UNE, analog special access, DS-1 Special Access etc …) provisioned to each such collocation arrangement:

i. during the last 3 months
ii. during the last 6 months
iii. during the past year.

d. The number of loops, by type (i.e., analog UNE, DS-1 UNE, analog special access, DS-1 Special Access etc …) in-service at each such collocation as of September 30, 2003, or as of the nearest possible date.

2. Self-Provisioning Trigger Claims.

3. Identify each wire center by location, name and CLLI code in which Verizon claims that an unaffiliated competitive switch provider provides service that qualifies it as a self provider of switching for mass market customers, and for each such wire center identify each such competitive switch provider. In addition, detail the basis upon which you believe such entity qualifies as a self provider, including the geographic markets within which each unaffiliated competitive switch provider is providing service and the product and customer markets reached by each unaffiliated competitive switch provider.

a. Identify by wire center each self-provisioning alternative to Verizon unbundled circuit switching and provide the basis upon which Verizon believes such entity qualifies as a self-provider.

b. Produce all documents substantiating any assertion that an unaffiliated competitive switch provider qualifies as a self provider and include the product, customer and geographic market that Verizon believes is served by such self provider.

c. Provide any documents, information, notes, work papers, or communications from the identified company in Verizon's possession or control relating to the identified company's ability, intent, desire, or willingness to provide or to make available wholesale unbundled local switching to CLECs.

4. For each carrier listed in response to question 3, please provide for each switch that Verizon believes or claims is used for self provisioning:

a. The 11-digit Common Language Location ("CLLI") code of the switch as it appears in the Local Exchange Routing Guide ("LERG"), the vertical and horizontal ("V&H") coordinates of the switch from the LERG, and claimed function of the switch (*e.g.*, stand-alone, host, or remote).

b. The location of each collocation arrangement that Verizon claims is interconnected to the switch.

c. The number of loops, by type (i.e., analog UNE, DS-1 UNE, analog special access, DS-1 Special Access etc …) provisioned to each such collocation:

i. during the last 3 months
ii. during the last 6 months
iii. during the past year.

d. The number of loops, by type (i.e., analog UNE, DS-1 UNE, analog special access, DS-1

Special Access etc …) in-service at each such collocation as of September 30, 2003, or as of the nearest possible date.

3. Requests Regarding Network and Market Demand.

5. For each applicable CLLI code, please provide: the associated LATA number; MSA number and name (if applicable); the V&H coordinates; the latitude and longitude (L&L) coordinates; the UNE loop rate zone; the special access density zone and whether interstate special access pricing flexibility is applicable for that end office.

6. For the most recent quarter for which information is available, for each wire center/CLLI Code in Verizon's territory in Massachusetts, and for the state as a whole, please provide (in the form of an Excel spreadsheet):

   a. the number of DS1 loops which Verizon provides to retail business customers, listing separately the total number of Centrex, PBX, and public lines so provided;

   b. the number of DS3 loops which Verizon provides to retail business customers, listing separately the total number of Centrex, PBX, and public lines so provided;

   c. the number of DS0 loops which Verizon provides to retail business customers (do not include voice grade equivalent capacity provided through DS1 or DS3 loops);

   d. with regard to Verizon's retail business customers using 24 or fewer DS0 loops at a single location, specify the number of business customers by the number of such DS0 loops (i.e., identify the number of business with a single DS0 line, with two analog lines, three analog lines, etc., through 24 analog lines)

   e. the number of DS1 loops that CLECs are serving through UNE-P, and if avaible break this out between business and residential customers;

   f. the number of DS3 loops that CLECs are serving through UNE-P, and if avaible break this out between business and residential customers;

   g. the number of DS0 loops at the DS0 level that CLECs are serving through UNE-P, and if avaible break this out between business and residential customers;

   h. the number of DS1 loops that CLECs are serving through UNE-L, and if avaible break this out between business and residential customers;

   i. the number of DS3 loops that CLECs are serving through UNE-L, and if avaible break this out between business and residential customers;

   j. the number of DS0 loops that CLECs are serving through UNE-L, and if avaible break this out between business and residential customers;

   k. the estimated number of DS1 loops that CLECs are serving entirely through their own facilities, and the basis for the estimate;

   l. the estimated number of DS3 loops that CLECs are serving entirely through their own facilities, and the basis for the estimate; and

   m. the estimated number of DS0 loops that CLECs are serving entirely through their own facilities, and the basis for the estimate.

7. Provide the number of EELs in service in Massachusetts at the end of the most recent quarter for which such information is available, stated separately for:

   a. EELs comprised of analog loops that are connected to analog transport.

b. EELs comprised of analog loops that are multiplexed onto higher speed (DS-1 or higher) transport.

c. EELs comprised of DS-1 loops that are connected to DS-1 transport

d. EELs comprised of DS-1 loops that are multiplexed onto DS-3 or higher transport.

e. EELs comprised of analog loops that are multiplexed onto higher speed (DS-1 or higher) transport.

8. Provide the number of EEL local connections, in DS-1 equivalents, by wire center for each quarter since the fourth quarter of 1999.

9. Provide the number of loops, by calendar year and by central office (by applicable CLLI code), in Massachusetts that are served by:

a. IDLC arrangements;

b. NGDLC arrangements; or

c. UDLC arrangements.

d. Of the IDLC loops, please state how many loops are transferable to universal digital loop carrier (UDLC) without additional construction.

10. Provide a forecast for the next five years, or the longest available forecast if a five-year forecast is not available, identifying the number of loops in Massachusetts that Verizon intends to serve via:

a. IDLC loop arrangements.

b. NGDLC loop arrangements.

11. During the past 5 years, has Verizon-Massachusetts ever added processor capacity or peripheral equipment to one or more of its local switches due to: (i) Increased usage; or (ii) Exhaust of the number of end-user lines that could be connected to the switch. If the answer to either part of the previous question above is yes, please identify:

a. The nature of the upgrade performed.

b. Whether Verizon had other end-office switches within a 15-mile radius with capacity to handle additional lines

c. If the answer to b. is yes, whether Verizon considered off-loading subscriber lines from the switch requiring the upgrade, and serving those lines from a different local switch. If Verizon did not consider doing so, why not?

d. If the answer to c. above is yes, produce all documents that refer, relate to, or discuss Verizon consideration of off-loading such lines to a different local switch.

12. What engineering guidelines or standards does Verizon use to determine when, if ever, to serve customer lines from a switch other than the switch located at the customer's serving wire center? Under what conditions, if any, would Verizon consider serving lines from a switch other than the one located in the customer's serving wire center? If so, please produce a copy of Verizon's switch engineering guidelines.

13. Are there any customers being served via UNE-P today that could not be served via UNE-L such as for reasons of no copper to replace UDLC, etc.? If so, please provide details including the number of such customers by wire center or CLLI code. For the Verizon access lines that are currently provisioned on IDLC technology, please state the percentage of such access lines for which Verizon has existing, parallel copper or Universal Digital Loop Carrier ("UDLC") facilities available for hot cut conversions.

B. Requests to Verizon Regarding Other Competitive and Economic Market Factors.

14. Please provide Verizon's variable costs, marginal costs, and forward-looking economic costs for local, long distance, and broadband services individually and as part of a bundled offering.

15. Please provide, chronologically by tariff filing date, a list of Verizon business and residential retail price or service changes for years 2002 and 2003 (to date) and, for each tariff filing, explain the services involved and the nature of the change (e.g., change in price, change in term, new bundle of services, etc.). Please include all state and federal tariffs under which service is offered in Massachusetts.

16. Identify and describe any constraints (if any) on Verizon's ability to a) reduce prices in relation to some measure of cost (e.g., price floor based on TSLRIC); b) target price reductions to geographic areas; c) target price reductions to types of customers (including individual customers).

17. Produce all documents referring to or discussing any strategic behavior (*e.g.*, pricing offers, packaged or bundled service offerings, waiver of fees, term contract offerings) that Verizon has implemented or evaluated in response or potential response to one or more CLEC's planned or actual entry into a local service market, either: (a) in Massachusetts; or (b) in some other state.

18. On a wire center basis, please provide Verizon-MA's average local revenue per retail small business line, per retail small business customer, per retail residential line, and per retail residential customer. If this information is not available on a wire center basis, please provide it on the next smallest geographic basis for which it is available. Please provide all backup upon which Verizon relied to calculate these amounts. Please provide the definition of small business customer that Verizon used in answering this question.

19. Please provide Verizon's average "take rate" for vertical features for small business customers, and for residential customers.

20. For each geographic area that Verizon claims is a separate geographic market within the market for providing retail telephony services to mass market customers in Massachusetts, please provide Verizon-MA's average local revenue per retail small business line, per retail small business customer, per retail residential line, and per retail residential customer. Please provide all backup upon which Verizon relied to calculate these amounts.

21. Provide all internal documents that refer, relate to, or discuss the profitability of Verizon using self-provided switching and unbundled loops leased from an ILEC to serve residential or business customers served by analog loops (hereinafter "mass-market customers") in any out-of-region area, or that refer or discuss any operational or economic issue [ILEC] has encountered in any effort [ILEC] has made to implement or expand its out-of-region local market entry strategy..

22. For out-of-region long distance services provided to mass-market customers, specify how Verizon obtains interexchange switching and transport capacity and the percentage of long distance services for interLATA voice mass-market customers that is provided using such non-Verizon facilities

C. Requests to Verizon Regarding Collocation.

23. Provide for the most recent calendar year for which such information is available, the total monthly recurring revenues received from collocation-based services (i.e., space charges, power charges, cabling, terminations/cross-connects, etc.) in that calendar year and the number of collocation arrangements in-service at the end of that year.

24. Provide for each calendar year from 1999 through 2002 separately for each type of collocation (e.g., caged physical, cageless physical, virtual, other) the total square footage and number of collocations in Massachusetts and the total annual revenue collected for each type of collocation.

25. In Verizon-MA's Central Offices (COs) that currently have one or more collocators, please provide the following information for each CO:

    a. Name and location of the CO;

    b. The area served by the CO;

    c. The number of collocations by collocation type;

    d. The total amount of space currently being used by collocators;

    e. The total amount of space available for use by collocators (which does not include space reserved for your company or its affiliates).

    f. The names of carriers currently occupying collocation space and the date of occupancy;

    g. Collocation space held by carriers who are currently in bankruptcy proceedings;

    h. Collocation space occupied by CLECs no longer operating;

    i. Whether the CO is manned or unmanned;

    j. The total number of UNE-L cross-connects in service in the CO;

    k. The number of UNE loops provisioned to each collocating carrier in the past 3 months.

26. Identify the number of Verizon-MA's Central Offices in which there are no current collocation arrangements provided to CLECs. Of the number identified, please identify name and location of the central office, and state whether the CO is manned or unmanned.

D. Requests to Verizon Regarding Hot Cuts.

27. Please provide UNE-Loop quantities provisioned by Verizon-MA by wire center in Masachusetts for each quarter from January 2001 to the present, distinguishing between business and residence lines, and stating quantities separately for: (a) new CLEC customer lines, (b) pre-existing CLEC customer (transitioning from total service retail), (c) pre-existing CLEC customer (transitioning from UNE-P), (d) ILEC retail customer migration to CLEC, and (e) CLEC-to-CLEC migration.

28. Please provide UNE Loop quantities provisioned by Verizon-MA for each quarter from January 2001 to the present, stating for each quarter and each Massachusetts wire center: (a) the average number of unbundled loops provisioned by Verizon on a daily basis for the quarter, (b) the fewest number of unbundled loops provisioned in a work day during the quarter, and (c) the maximum number of unbundled loops provisioned in a work day.

29. Provide the quantity of UNE-P lines in service in each Massachusetts wire center, separated by business and residence, as of January 1, 2002, July 2, 2002, January 1, 2003, July 1, 2003, and at Present (specifying date through which data is reported).

30. Provide monthly quantifies of UNE-L lines provisioned in each Massachusetts wire center, separated by business and residence, beginning January 1, 2001, through the last month for which data are available.

31. Provide the quantity of UNE-L lines in service in each Massachusetts wire center, separated by business and residence, as of January 1, 2002, July 2, 2002, January 1, 2003, July 1, 2003, and at Present (specifying date through which data are reported).

32. Provide for each wire center in Massachusetts on a monthly basis the number of CLEC-served

lines for which disconnects have been processed (Customer Service Provider Change or Other Reason), separated by UNE-P and UNE-L, and, if available, for each UNE-P and UNE-L category, further separated by business and residence.

33. Has Verizon ever estimated, or communicated to any CLEC, the total number of cutovers Verizon is capable of performing per day per central office in Massachusetts, or for some geographic grouping or groupings of central offices in Massachusetts? If yes, provide the substance of those estimates or communications, including all documents discussing or concerning limitations on the number of hot cuts that can be performed. If there are differences in the maximum number of cutovers that can be performed in different central offices or geographic areas, please explain in detail the reasons for the differences.

34. For each month since January 1, 2001, please provide the total number of loop cutovers by wire center that resulted in the loop being swung back to Verizon's switch, and also specify how many occurred within 10 days of the provisioning due date and how many occurred beyond 10 days of the provisioning due date.

35. Has Verizon considered deploying NGDLC arrangements that packetize both the voice and data services? If so, please describe all such alternatives considered and produce all documents that refer, concern, or discuss Verizon's deployment or potential deployment of NGDLC arrangements that packetize both the voice and data services.

36. Describe with specificity Verizon's plans to retire any copper loop plant in Massachusetts. Please provide any documents describing such plans.

37. Please describe with specificity the process Verizon uses in retiring copper loop plant. Please specifically include in your answer the notice Verizon provides to CLECs who have customers that provide service using the plant and what options will be available to CLECs providing voice and/or DSL service to customers served by copper loop plant [that Verizon plans to retire.

38. Please provide the number of lines served by DLC for which alternative copper loop facilities are currently not available.

39. What percentage of Verizon's copper facilities in Massachusetts has been retired? Please provide the basis for your calculation, including the nature and sources of data used.

40. Please describe with specificity the process by which CLECs providing voice service to a mass-market customer utilizing unbundled local switching could add data service. Please also provide the following information regarding the process:

    a. Please state whether the process is mechanized or manual. If the process is mechanized, please state whether the service orders flow through. If orders do flow through, please state the percentage of the service orders that flow through to completion;

    b. Please list the recurring and nonrecurring charges the CLEC would incur;

    c. Please provide the average service outage experienced by the end user customer;

    d. Please state whether the loop and switchport would be reused or whether new facilities would be provisioned;

    e. Please state whether information in downstream databases, including 911, LIDB and directory listings would be impacted. If your answer is yes, please explain all such effects in detail.

41. Please describe with specificity the process by which CLECs providing voice service to a mass market customer utilizing its own switches together with unbundled loops leased from Verizon could add data service. Please also provide the following information regarding the process:

    a. Please state whether the process is mechanized or manual. If the process is mechanized,

please state whether the service orders flow through. If orders do flow through, please state the percentage of the service orders that flow through to completion;

b. Please list the recurring and nonrecurring charges the CLEC would incur;

c. Please provide the average service outage experienced by the end user customer;

d. Please state whether the loop would be reused or whether new facilities would be provisioned;

e. Please state whether information in downstream databases, including 911, LIDB and directory listings would be impacted. If your answer is yes, please explain all such effects in detail.

42. Does Verizon have logs or other records documenting the time required by its employees to complete all or some of the tasks associated with either the individual hot cut process or the bulk hot cut process? If yes, in what form does Verizon maintain such records (e.g. electronically, on paper)? In addition, please list each task for which completion time is logged. Please provide such records, organized by the CO location in which the recorded work occurred. Please also provide any documentation that contains descriptions or instructions concerning these logs or records.

43. Please identify any central offices in which Verizon-MA has never performed a hot cut.

44. How many separate cross-connections are typically required for Verizon to complete a hot cut on a:

a. Cosmic Distributing Frame

b. Main Distributing Frame with Intermediate Distributing Frames

c. Main Distributing Frame without Intermediate Distributing Frames

45. For each Verizon-MA host and remote central office, please state whether access lines are cross-connected via a:

a. Cosmic Distributing Frame

b. Main Distributing Frame with Intermediate Distributing Frames

c. Main Distributing Frame without Intermediate Distributing Frames

d. any combination of (a), (b), or (c).

46. What percentage of access lines that Verizon currently provisions to CLECs on a UNE-P basis are located in staffed CO's? What percentage of access lines that Verizon currently provisions to CLECs on a UNE-P basis are located in unstaffed CO's? If these two numbers do not sum to 100 percent, please explain why. Please state the date that Verizon used when calculating the percentage.

47. What percentage of access lines that Verizon provides to its retail customers are located in staffed CO's? What percent of access lines that Verizon provides to its retail customers are located in unstaffed CO's? If these two numbers do not sum to 100 percent, please explain why.

48. Does Verizon have a policy limiting the number of CO's in which bulk hot cuts may occur in a single day or night? If so, please describe the policy and state whether limits are established for particular geographic or manager's areas within the Verizon territory? Please define the geographic or manger's areas for which such limits are established and explain the basis or reasons for these area definitions. Please provide a detailed explanation for why these limits are being imposed and provide all documents describing or discussing the limits or the decision to impose such limits.

49. Does Verizon have a policy limiting the number of bulk hot cuts or bulk hot cut projects in a single day or night? If so, please describe the policy and state whether limits are established for particular geographic or manager's areas within the Verizon territory? Please define the geographic or manger's areas for which such limits are established and explain the basis or reasons for these area definitions. Please provide a detailed explanation for why these limits are being imposed and provide all documents describing or discussing the limits or the decision to impose such limits.

50. Please identify what percent of hot cut LSRs received by Verizon in the last 12 months for which data are available have required a field dispatch to remove a customer from an access line(s) provisioned on an IDLC system? Please explain how you calculated or estimated the percentage and provide supporting work papers.

51. Please explain and list all system modifications made since 1998 that affect the flow through capabilities of the Verizon's OSSs used to process hot cut orders. Please explain and list all Verizon OSS system modifications planned in anticipation of, and related to, the provisioning of bulk hot cuts.

52. Please provide copies of all Verizon materials, documents or job aids describing methods and procedures related to the performance of individual or bulk hot cuts and associated number portability. Such documents should include materials provided to Verizon personnel in the RCCC and RCMAC.

53. Please explain how Verizon's performance conducting bulk hot cuts is treated under the currently effective Performance Assurance Plan in Massachusetts ("PAP"). Please identify each provision in the PAP upon which Verizon relies for its answer.

54. What percentage of access lines that Verizon currently provisions to CLECs on a UNE-P basis are provisioned on IDLC systems?

55. For each day between August 1, 2000 and August 1, 2003, or for the latest period in which this information is available, and for each Verizon-MA central office, please separately provide the number of interLATA and intraLATA PIC changes processed by Verizon.

II. PROPOSED DISCOVERY TO CLECS.

56. Please identify each switch owned or operated by the CLEC that is located in Massachusetts or an adjacent state and which is capable of providing local exchange service in Massachusetts. With regard to each switch identified, please provide:

    a. The switch type, including manufacturer and model;

    b. a list of all NPA/NXX's served with the switch;

    c. CLLI code;

    d. Geographic reach;

    e. a list of all Verizon central offices in which the CLEC has a collocation arrangement which subtends to the switch;

    f. Switch capacity, by number of voice grade equivalent lines; and

    g. Date of switch activation;

57. Identify each Verizon central service office in Massachusetts in which the CLEC maintains a collocation arrangement. For each central office or collocation arrangement identified, please

provide or state:

a. The type of collocation arrangement (caged, cageless, virtual);

b. The identity, by location, of the CLEC switch or switches to which the collocation arrangement subtends;

c. The size of the collocation space or, if cageless, the number of equipment frames;

d. The type and capacity of equipment included in collocation, including digital line carrier equipment;

e. The current status of the collocation, i.e. active, no longer in use to provide service;

f. the type of customers to which the CLEC provides service using the equipment in the collocation arrangement, specifying the number of residential, small business, and enterprise customers so served from each central office.

g. The number of loops, by type (i.e., analog UNE, DS-1 UNE, analog special access, DS-1 Special Access etc …) in-service at each such collocation as of September 30, 2003, or as of the nearest possible date.

h. The total number of voice-equivalent lines being served out of the collocation arrangement, what percent were installed in the past 12 months, and what percent were installed in the preceeding 12 months;

i. the number of business lines at the DS1 level or above that the CLEC is serving through UNE-L out of the collocation arrangment, what percent were installed in the past 12 months, and what percent were installed in the preceeding 12 months;

j. the number of business lines at the DS0 level that the CLEC is serving through UNE-L out of the collocation arrangement, what percent were installed in the past 12 months, and what percent were installed in the preceeding 12 months;

k. with regard to small business customers using 24 or fewer analog lines and being served out of the collocation arrangment, specify the number of business customers by the number of such analog lines (i.e., identify the number of business with a single DS0 line, with two analog lines, three analog lines, etc., through 24 analog lines)

l. the number of residential voice-grade equivalent lines that the CLEC is serving through UNE-L out of the collocation arrangement, what percent were installed in the past 12 months, and what percent were installed in the preceeding 12 months;

m. whether the CLEC currently markets to residential mass market customers served out of that central office; and

n. whether the CLEC currently markets to small business mass market customers served out of that central office.

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